

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

UNITED STATES OF AMERICA,

Plaintiff,

v.

Case No. 25-CR-045

JUNIOR A. ANDERSON,

Defendant.

**UNITED STATES' MOTION TO DISMISS PROPERTY
FROM FORFEITURE NOTICE OF THE INDICTMENT**

The United States of America, by its attorneys, Richard G. Frohling, Acting United States Attorney for the Eastern District of Wisconsin, and Timothy W. Funnell, Assistant United States Attorney, hereby moves, pursuant to Rule 48(a) of the Federal Rules of Criminal Procedure, to dismiss without prejudice the following properties from the forfeiture notice of the Indictment filed on March 11, 2025:

1. a 9mm pistol with no serial number and marked with "PF9406C Polymer80, Inc. Made in USA Dayton, NV";
2. a Browning 9mm pistol bearing serial number 245NZ5204l; and
3. a 9mm pistol with no serial number and marked with "PF9406C Polymer80, Inc. Made in USA Dayton, NV."

I have been informed by the Bureau of Alcohol, Tobacco, Firearms, and Explosives that these items were purchased by law enforcement during their investigation and therefore belong to the United States. Therefore, it is no longer necessary to pursue the judicial forfeiture of these items.

Dated at Green Bay, Wisconsin, this 19th day of May, 2025.

Respectfully submitted,

RICHARD G. FROHLING
Acting United States Attorney

By: *s/Timothy W. Funnell*
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